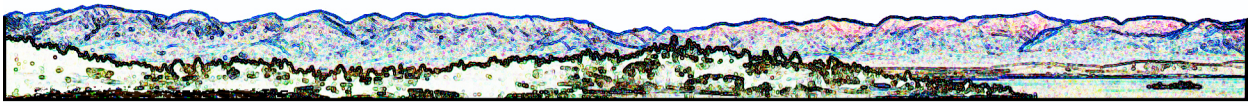
Swan View Coalition *Nature and Human Nature on the Same Path*



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April 2, 2025

Chris Dowling
Swan Lake District Ranger
200 Ranger Station Road
Bigfork, MT 59911

Submitted as pdf via https://cara.fs2c.usda.gov/Public//CommentInput?Project=64492

Re: East Valley Fuels Reduction Project – Second Letter of Comments

Dear Ranger Dowling;

We have read your Scoping Document in the above matter and submit these supplemental comments for the public record. These comments will provide more detail and reference supportive documents we will upload via the CARA portal. We will begin by referencing the comment number used in our 3/17/25 comments:

1. To support our claim that thinning 2,541 acres of forest will allow more sunlight and wind to reach the forest floor, drying out the vegetation and increasing the rate at which fire spreads, we will upload "Living with Fire.pdf" which, on page 4 shows how thinning dense conifer forest can triple the rate at which fire travels. We will also upload our "SVC Bug Creek Objection 210426." That Objection includes, among others, Atchley et al (2021) and the 5/18/21 Declaration of Joseph Werne with its attached research papers in this regard.

2. We will also upload our "250218 SVC on West Reservoir.pdf" comments, which include photos of slash piles from the Middle Fork Fuels Reduction Project as examples of how logging/thinning puts far more CO2 into the atmosphere than does wildfire. These photos and discussion also illustrate the damaging removal of "standing and fallen wood, alive and dead [that] is critical to the function of forest ecosystems and the sequestration of carbon."

3. We can't understate the degree to which logging and thinning facilitate trespass of road closures by motorized vehicles and the establishment of user-created trails – both of which are a major problem in the project area and across the Flathead NF. The uploaded "250218 SVC on West Reservoir.pdf" referenced above provides a clear description of the fact that the Flathead Forest Plan does not have an adequate Biological Opinion for grizzly bears and bull trout relative to the management of roads and road closures and lacks adequate road reclamation and culvert removal standards. The government has now received three adverse opinions from three different judges at

the U.S. District Court in Missoula on its Flathead Forest Plan and its BiOp. We will upload the latest opinion, which the government recently declined to appeal, "Christensen 2024-06-28_ORDER.pdf."

We will also upload our "Hammer 2023 Road Hunt.pdf" and "Hammer 2024 Roads Revisited.pdf" reports, which pinpoint a number of roads in the project area we have repeatedly found ineffective at stopping motor vehicles. Among those ineffectively closed roads in the project area are 5392Y, 10319, 10320, 10321, 5388X. Please explain how your logging and thinning will not make these and other roads and trails in the area more vulnerable to motorized trespass.

We will also upload "Q-22_CB_RoadClosureEffectiveness.pdf," in which even the Flathead NF admits that its road closure effectiveness rate is declining instead of getting better.

We will also upload "Bug Creek Project Trails DIL 250327.pdf," a Daily Inter Lake news article describing how the Flathead NF has embraced user-created mountain bike trails and partnered with a mountain bike organization (that essentially praises the unlawful creation of those trails) to now bring many of them into the legal trail "system." As you well know, the creation of user-created trails is an ongoing problem in the project area, as is a lack of law enforcement. Even the prior District Ranger, Richard Kehr, highlights these problems in his 3/25/25 comments on the East Valley project:

> Unauthorized creation of trails is a problem in this area. Thinning stands and treating fuels in the urban interface may lead to the creation of more unauthorized motorized and non-motorized trails. Mitigation measures should be developed and enforced to prevent development of unauthorized braided trail systems.

Indeed, your proposal and environmental analyses must fully acknowledge the problems of weeds, user-created trails, and ineffective road closures, that inadequate Forest Plans and BiOps, along with past logging and other Flathead NF actions and inactions, have wrought. Please explain how thinning units 12 thru 12d and 211, 212 and 214 will add to rather than frustrate your recent attempts to "naturalize and block" to motor vehicles all user-created and naturally reclaimed trails in Krause Basin. A lot of volunteer work went into naturalizing and blocking user-created trails there in Summer 2024, per your 9/14/23 letter, Krause Basin Collaborative Map, and subsequent Motor Vehicle Use Map (uploaded as "Krause-Basin-Letter-with-Map-Link.pdf," "Final Krause Collaborative Map Corrected opt.pdf" and "SLRD MVUMap 2024.pdf," respectively). Please explain how this fuels reduction project will reduce rather than increase the ease with which user-created trails can be established.

While you state logging use of closed roads would likely occur "during the grizzly bear winter denning season," you fail to use the shorter January 1 – February 15 denning dates determined by numerous grizzly bear experts and the U.S. District Court in Missoula. We will upload that Court Order as "injunction-grizzlies-wolves.pdf."

4. Please see the above uploaded "SVC Bug Creek Objection 210426.pdf" for regulatory information concerning your proposed logging that "would result in six new even age

openings over 40 acres," the maximum recommended by the National Forest Management Act. The project area has high scenic, recreational and wildlife values that would be harmed by these huge logging units that would essentially be clearcuts.

5. Please again see the above uploaded "SVC Bug Creek Objection 210426.pdf" and its attachments K and L for case law and descriptions of the substantial uncertainty regarding the kinds of environmental impacts that arise from the type of project you are proposing. These attachments indicate an EIS is likely warranted and an EA is essential to determining whether such is the case.

Your intention to use a Categorical Exclusion from the preparation of an Environmental Assessment would preclude a meaningful determination of whether or not significant environmental effects are involved and would preclude essential public involvement in making such determinations. A Categorical Exclusion cannot be used to piecemeal a larger program or project into smaller pieces without an adequate assessment of the environmental and cumulative impacts of the program or larger project. Is East Valley the only fuels reduction logging the Flathead NF will be proposing or conducting over the next 10-20 years, or will there be a series of these smaller bites at the big apple? What are the impacts of other logging and fuels reduction work being conducted by MT DNRC and private land owners in and adjacent to the project area – and what are the expected impacts cumulatively with what can be expected on the Flathead NF?

We appreciate this opportunity to comment, but further opportunities to comment and Object should be provided once details of the project and its environmental effects are made public.

Sincerely,

Keith

Keith J. Hammer
Chair

Uploaded files: "Living with Fire.pdf", "SVC Bug Creek Objection 210426", "250218 SVC on West Reservoir.pdf", "Christensen 2024-06-28_ORDER.pdf", "Hammer 2023 Road Hunt.pdf", "Hammer 2024 Roads Revisited.pdf", "Q-22_CB_RoadClosureEffectiveness.pdf", "Bug Creek Project Trails DIL 250327.pdf", "Krause-Basin-Letter-with-Map-Link.pdf", "Final Krause Collaborative Map Corrected opt.pdf", "SLRD MVUMap 2024.pdf", and "injunction-grizzlies-wolves.pdf".