

Mid-Swan Talking Points
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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).

Both DEIS Alternatives fail to significantly reduce the FS's 567 mile logging road system, let alone reduce it to its historic level of zero in order to truly restore the landscape. The project area also includes another 578 miles of state and private roads! (DEIS page 190).

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).

Alternative C is a straw man attempting to look like restoration because it builds fewer new roads. It would still retain a 523 mile FS logging road system that continues to harm fish and wildlife. (DEIS pages xii-xvi and 66).

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).

The DEIS refused to develop an alternative that would establish historic levels of zero roads on the landscape to serve as a benchmark for comparing alternatives with lesser levels of landscape restoration. You don't know how far from home you are if you don't remember where home is. (DEIS at 88).

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 site-specific details of where and when roads and logging will occur over the next 15 years, yet it makes clear that once those details are later disclosed, the public will have no formal process by which to analyze the

environmental effects as required by the National Environmental Policy Act. (DEIS at A-4). This “condition based management” approach, with inadequate public review of the specifics, was struck down as a violation of NEPA by the U.S. District Court in Alaska in the Prince of Wales Project case.

The DEIS is a vague reiteration of the revised Flathead Forest Plan and is useful only in displaying the utter arrogance of the Forest Service and its desire to “manage” every inch of native forest ecosystems in order to increase its budget and enrich the timber industry through timber sales heavily subsidized by the American taxpayer.

Alternative B would harvest between 197-235 MMBF of timber, while alternative C would harvest between 101-115 MMBF. Log trucks can carry about 4 MBF per load, so there would be between 49,250-58,750 trips on the haul route for alternative B and between 25,250-28,750 trips for alternative C. (DEIS page 176).

Aquatic baseline condition indicators are not ground-truthed but GIS generated using aerial photo interpretation. (DEIS pg 160-161). The revised Forest Plan eliminated the Riparian Management Objectives for temperature, pool frequency, etc. so there is no quantification of impacts to streams.

Congress invested \$35.5 million into the Southwest Crown Collaborative, which includes most of the Mid-Swan Project Area, via the Collaborative Forest Landscape Restoration Program (CFLRP) from 2010-2019. Logging and vegetation goals were exceeded by 100% or more while road decommissioning fell 50% short. There will be no more CFLRP funding for this area.

(https://static1.squarespace.com/static/58ac86718419c25e73caff05/t/5e28994378c38064ef9a2927/1579719022078/FY19+CFLRP+Annual+Report_SWCC_Final.pdf)

The DEIS acknowledges that timber sales won't necessarily pay for the removal of roads and culverts to restore fish and wildlife habitat - and that these and other restoration activities will be dependent on non-existent funding. In other words, timber sales will go forward while restoration work will go begging, just as happened in the SWCC area even when CFLRP was available. (DEIS at 47 and A-58).

The Mid-Swan Project web site is at:

<https://www.fs.usda.gov/detailfull/flathead/landmanagement/projects/?cid=fseprd787388&width=full>

For an all-telling Flathead NF graphic of how it intends to fragment habitat toward a more highly fragmented “desired condition,” see:

http://www.swanview.org/graphics/Fragment_Lynx_Habitat_p20_light.jpg

That graphic is taken from page 20 of the September 2, 2020 Slide Show, located at:

https://www.fs.usda.gov/nfs/11558/www/nepa/110188_FSPLT3_5347149.pdf