

April 8, 2018

To: Swan Valley Community Council c/o Henry Westra

From: Suzanne M. Vernon, Condon, MT

Re: Comments on the 2nd Draft of the Swan Valley Regional Plan

Thank you for taking comments on this Draft of the plan. I support the plan as it is. However, since you have asked, and you are looking for specific suggestions, I offer the following.

In summary, the Plan committee worked hard to incorporate all comments from the public comment period on the 1st Draft. I attended as many meetings as possible as a member of the public, and as one of the people who commented on the 1st Draft. I feel they did a good job. However, there were areas of contention, mostly due to the disagreement over the weight of Harry Blazer's comments. Blazer hired an attorney to edit the document, and some members of the Planning committee allowed more weight to the attorney's edits than to other comments. In the interest of shortening the document, some portions of the text were, some felt, hurriedly eliminated. I won't address those here, as others are commenting on those sections, especially Section 4.

My specific comments are as follows:

Introduction, and Sections 1-2.

Page 5. Paragraph 7. It is entirely appropriate to include DRAFT documents as references. Ken Donovan, chair of the Swan Valley Community Council continues to insist that the *Profile* should be approved by the Missoula County Commissioners, as he did at the March meeting of the Council where he addressed a County representative with this question. Approval is not necessary in order for the document to be used, referenced, or cited in this Plan. This paragraph can remain as it is in this Draft.

Page 5. Paragraph 8. Item 2. The clause "As a result of the Montana Legacy Project" should be struck from this sentence." It makes the reader think that somehow the Legacy Project is to blame for a lack of private land, when in fact, the private land in the Valley is the result of a Congressional Act regarding the railroad, and decades of railroad land divestment, not just the Legacy Project or the 1906 Forest Homestead Act. At best, it is a poorly written sentence. I regret that I was not at the meeting where this paragraph was edited. It should read simply, "Land acreage available for development is approximately 10.6% of the total planning area. . . etc." Leave out the politics, please.

Section 1.12. Geographically, the Swan Valley is part of the Flathead River Basin. The Flathead Basin Commission has studied groundwater in this area. However, our political affiliate is Missoula County. Perhaps this should be noted.

Section 1.13 Noise. This is my favorite part of the Plan. Please keep it in. We treasure the quiet of this place.

Section 1.14. Light. This is my second favorite part of the Plan. Please keep it in. We treasure the fact that we can see the Milky Way at night.

Section 2.2. Timber harvesting, last sentence of paragraph. I believe this is the only place where *climate change* is mentioned. Climate Change should have its own paragraph and be addressed separately.

Eco-tourism. In this paragraph, we should point out that we are part of the Crown of the Continent.

Section 3.

3.4 WUI

Homeowners need to know that THEY bear the burden of protecting their homes from wildfire in this community. Their homeowners' insurance company is the best source of information. This paragraph doesn't communicate that. Missoula County subdivision laws, the government claims process -- both state and federal -- all point to the homeowner as being responsible for loss incurred during wildfire. People need to build their homes with that in mind. They need to carry appropriate insurance, and maintain access and firefighting systems, i.e. roads, and water handling capabilities for sprinklers and pumps.

The sentence that reads, "The U.S. Forest Service is encouraged to remove, or cause to be removed . . ." doesn't acknowledge that the government is subject to the NEPA process for work that it does. Nor does it acknowledge that the jury is still out as to whether removing timber actually reduces the possibility of lightning and human-caused wildfire. Studies show results both ways, especially in the Pacific Northwest. While the Swan Valley Community Council has the ability to comment on Forest Service work, the Swan Valley Regional Plan is not the place to comment on future Forest Service harvest activities as fuels reduction methods. Fuels reduction projects should be judged on a case-by-case basis, depending on local ecosystems and values at risk. The sentence should be removed from the Plan.

3.6. Asset Based Approach

This is the most important section of the Plan. Please leave it in.

That's it for my comments. #####