

April 20-2019

To: Objection Reviewing Officer
USPA Forest Service, Northern Region
26 Fort Missoula Rd
Missoula, MT. 59804

Re: Red Rocks Project - 51022 Objection to Decision

Dear Sirs,

McCauley Ranches objects to the decision on this project as to insufficient analysis of the issues we raised during all the preliminary public input.

Specifically #1. Wateryield - No analysis was presented by the Forest Service of Historical Flows at the Koulder River Gauging Station. It appears that since the pine beetle kill over such a large area of the drainage has since 2010 increased earlier April thru June increase in Runoff. Logging @ elevation above 6800' will increase that runoff during that time period and leave less wateryield for late summer for which our ranching operation depends on. This will have an adverse effect upon our economic well being. Areas 72A-B, 76A-F, 634th 69398

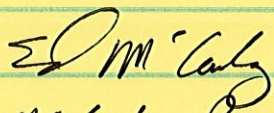
#2 Forest Plan direction for Sub Alpine Fir calls only for Fire, no logging. Removal of High elevation timber will further expose snow load to early release rather than protection from solar radiation by timber. It seems improbable that live trees will not be damaged and that they will ultimately be harvested or fall once stand density is removed and they are exposed to wind load with

weakened protection.

#3 Road storage or Roads moved to Maintenance level I.

We object that Sunrise Road 9347 once it enters the Project area in Sec 24, T5N, R7W doesn't meet criteria to be moved to level I. This was supposed to happen as (3.6 miles) part of the Sunrise Sale and still would provide Hiking opportunity according to that Sale E.A. This also would take the pressure off the elk Summer Range from Human dispersion pushing them onto private lands in the area and specifically Sec 25 & 36; T5R7 and Sec 19, 20, 30 & 31; T5N, R6W. It appears the MFWP would support that rather than close roads to private properties as proposed in Sec 24 & 25; T6N, R7W.

In closing it still appears the decision only uses what the Forest Service wants and they ~~don't~~ dismiss everything that doesn't fit their objective with little regard for the effects on private enterprise. Frankly it is disgusting. Make the changes please.

Sincerely, 
M. Carley Ranches
P.O. Box 393
Boulder, MT. 59632

USGS Boulder River 0603000

	April 238 1421	May 7130 May	June 603 June	July 176 Jul	Aug 85 Aug	Sept Sept	Oct
J009						32	67
J010	176	414	1008	201	112	91	61
High J011	108	911	1530	287	70	33	55
J012	365	420	303	67	24	14	29
J013	96	370	231	46	23	27	53
J014	227	870	420	101	78	53	53
15	222	413	225	55	30	35	35
16	326	460	173	48	20	23	49
17	140	494	370	62	22	25	46
18	223	1408	795	193	61	51	
Mean	212	648	566	124	53	39	50

1989-2008	148	408	369	94	39	30	34
1929 to 2018	170	481	425	97	33	29	38
1989 to 2011	151	444	458	111	45	33	38
2012 to 2018	229	634	360	82	37	33	45
1929 to 2011	164	465	432	98	33	29	37
2009 to 2018	212	648	566	124	53	39	50
1929 to 2008	164	456	404	93	30	28	36

1989 to 2011 vs 2012 to 2018 April/May less runoff early, more June-July-Aug

1929 to 2011 vs 2012 to 2018 April/May less runoff early more June-July

2009 to 2018 Dead trees in drainage seem to be increasing late summer flows

$$9550' + 4200' = 2.6 \text{ miles}$$

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High 2011	108	911	1530	287	70	33	55
2012	365	420	303	67	24	14	29
2013	96	370	231	46	23	27	53
2014	227	870	420	101	78	53	53
15	222	413	225	55	30	35	35
16	326	460	173	48	20	23	49
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