

From: [personal](#)
To: [FS-appeals-northern-regional-office](#)
Cc: jloomis@mt.net
Subject: Red Rocks Vegetation Project Objection
Date: Friday, April 26, 2019 4:52:33 PM

Objection Reviewing Officer

USDA Forest Service, Northern Region,

26 Fort Missoula Road,

Missoula MT 59804

Red Rocks Vegetation Project, Beaverhead-Deerlodge National Forest

Objection Reviewing Officer,

I object to the Red Rocks Vegetation Project Draft Decision for the several reasons. One, the decision is different than the draft that I commented on during the scoping period. The Draft Decision removes 253 acres of forest (pg. 2 refers to this action as a "Modified Proposed Action") that was previously scheduled for vegetation treatment in the scoping document. This is a significant decrease in the treatment area. If the forest service took a hard look at all aspects of this project before releasing it for public comment, it would have reached the conclusion that another Alternative should be added to the proposal. The majority of the scoping comments support the forest service's position to aggressively reduce the fuel load in the forest. The public should have the opportunity to review and comment on this project with these important changes included. Was this project subjected to a consistency review? It's clear more research is needed and the project is not ready for public comment.

As I previously stated in my comments submitted to the forest service 3/19/2018, I object to the closure of 21.9 miles of motorized routes. The Draft Decision pg.9 portrays the majority of these routes as "already grown in and functionally closed". Is a trail that is in need of maintenance a new criteria for closure? This sets a frightening precedent that may bring litigation from many motorized groups.

Additionally, after the massive losses of motorized routes in the recent Beaverhead-Deerlodge Forest Plan, the forest service pledged there would be no more motorized trail losses in the Boulder area. The Beaverhead-Deerlodge Revised Forest Plan states on page 376 for the Boulder River area "Alternative 6, the preferred alternative.....No changes in the management of other roads and trails shall occur." Also, the agency states in the revision to work with the motorized community to improve the Boulder area for motorized recreation. The Beaverhead-Deerlodge Revised Forest Plan makes this very clear on page 14. It states, "The Revised

Forest Plan specifically emphasizes motorized recreation in several management areas. Future site-specific travel planning in these areas will provide outstanding opportunities for the public to collaborate on creating "showcase" recreational sites. Key areas with a motorized emphasis include Pipestone, East Face, South Fleecer, Little Boulder-Gelena, Meadow Creek, and Butte North." It is evident, the Forest plan calls for more motorized recreation opportunities in the Boulder, not less. By closing 21.9 miles of motorized routes in the Boulder area the forest service is violating its own Forest Plan directive.

Page eighteen of the Draft Decision addresses Alternatives Considered, but Eliminated from Detailed Study. The last bullet point reads "an alternative that provides additional motorized trail opportunities for off-highway vehicle." The document goes on to say "These alternatives do not meet the purpose and need for action for this project or are outside the scope of the project." If additional motorized opportunities do not meet the purpose and need for action or are outside the scope of this project, than reductions of motorized opportunities do not meet the purpose and need for action or are outside the scope of this project as well.

The Red Rock Vegetation Project is a fuels reduction project. Travel Management is entirely out of the scope of this project and all proposed motorized closures should be withdrawn.

Finally, the project maps are very difficult to read and incomplete. There are missing landmarks, routes and route numbers. I noted in my previous comments that Sullivan Gulch was missing from the maps, along with the popular Galena Gulch and routes 121, 78, 1566, 8588, 5130, 8668, 8589, 5129, 172, 69. Why is all this information left off of the project map? The agency should have used the standard Forest Visitor/Travel Map for this project, it's detailed and easier to read. The standard map, made available by the forest service, has been in circulation for years. The public would be better served if the agency would have presented this project on a map that we were already familiar with.

Going forward, I recommend the forest service provide a revised draft that removes all road and trail closures and clearly identifies all the areas for treatment. This revised draft should be mapped clearly, with all routes, route numbers, and landmarks. The public comment period could now be reopened. With these much needed improvements, the forest service would have the full support of the public for this important fuels reduction project.

If I can be of any assistance to the forest service on this project, please don't hesitate to contact me.

Thank you for this consideration.

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