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March 25, 2019

Objection Reviewing Officer

USFS, Missoula MT.

Objector – Kirk Thompson, [REDACTED]

Project – Darby lumber Lands-Phase II, Matt Anderson, Forest Supervisor, Bitterroot National Forest

Project is on the Darby Ranger District, Bitterroot NF

The FONSI does not clearly describe the access to unit 10, or the planned haul route. My comments are based on my best interpretation.

1. It appears some access is planned through private land, and that such access will be required in the future. I believe FS policy requires permanent access rights unless there is no foreseeable need for any future access. The decision should clearly state why there is no need for future access, or change the decision to obtain permanent right of access.
2. Road construction is planned in Management Area 8b. The Forest Plan does not permit new road construction in this MA, unless such road is necessary to access other MA's. Many of the roads shown only access MA 8b, and thus are not permitted. These roads need to be dropped, as the objectives for MA 8b can be achieved without them, or a Forest Plan amendment would be needed. Units involved are 3,10, and part of 5.
3. While I do not have definitive data available, it still appears that a lot of permanent and temporary road construction is being planned to access a very small amount of timber in unit 10 and part of 3. Much of this construction is planned near stream bottoms. Eliminating this access also eliminates the problem in #1 above.
4. The EA has many good statements of intentions to stop the spread of weeds. However, roads are the usual vector to move weeds into areas that are logged. Good intentions have not been successful in the past, and are not likely to work in the future. The UFSF should base the FONSI on past experience, or set up an achievable mechanism to eliminate weed spread in the future,

Attached is my letter of 11/5/2018 that deals with the objections raised here.

I will attend an oral hearing if one is scheduled.



Kirk Thompson

852 Willoughby Lane
Stevensville, MT 59870
November 5, 2018

Mr. Eric Winthers
District Ranger

Comments on Darby Lumber Lands-Phase 2

Unit 10 and part of unit 3 require about 1 mile of road for access. While the EA does not have volume information on these areas, there should be an evaluation as to whether logging them makes economic sense. How much volume for the mile of road? An additional consideration is that it is not a good idea to provide road access from private land that cannot be used by the public (or possibly even by the FS) to access NF lands.

Any new road construction becomes a vector for weed entry. Since the FS cannot guarantee long term weed control, there needs to be really strong reasons for new roads. An evaluation of whether management goals can be achieved without new roads is especially important in MA 8b and in marginal timber areas of MA2. Fuel reduction can be done without roads, and if you do not calculate the true cost of weed control (or the cost of weed invasion), you have not correctly calculated all costs.

I support fuel reduction in the WUI, but request you apply marking principles UM Professor Andrew Larson presented to the Bitterroot Restoration Committee in January 2018 on variable pattern thinning as opposed to uniform spacing. It retains a more natural -looking forest with more wildlife benefits.

The road building in MA 8b to access timber in that unit does not comply with Forest Plan standards. I suggest you look at other alternatives to achieve management goals. The consequences of violating FP standards are not good, and a temporary road is still a road.

Protect old growth stands.

ATV connectors that were built in DLL Phase 1 lacked drainage and had berms left on the downhill side. Better construction should be required in Phase 2. These ATV routes are in effect narrow roads, and they should meet good road standards for construction and drainage. There also appears to be a lack of weed control on the existing ATV roads.

Roads that access the north end of the area suffer from lack of maintenance, which is likely to continue in the future. Better surfacing and more drainage should be provided to prevent future damage even with minimal maintenance.

Kirk Thompson