

Larry Campbell

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April 5, 2019

Objection Reviewing Officer

USDA Forest Service, Northern Region

26 Fort Missoula Road

Missoula, MT 59804

Sent via Email: [appeals-northern.regional-office@fs.fed.us](mailto:appeals-northern.regional-office@fs.fed.us)

Re: Darby Lumber Lands Phase 2 Project Objection

To the Objection Reviewing Officer,

Pursuant to 36 C.F.R. Part 218, Larry Campbell, "Objector" files this Objection to the 2019 Updated Environmental Assessment ("EA"), the Finding of No Significant Impact ("FONSI") and Draft Record of Decision ("DROD") issued by the Bitterroot National Forest. I filed scoping comments and comments on the Draft EA. Objector has fully participated in the agency review of the project. As such I am a proper Objector under Part 218.

The objector's name, address, telephone number and email address are as follows:

Larry Campbell, [REDACTED]

Issue 1) Project design criteria provide that, "Dust abatement for log hauling will be completed on sections of roads in the project area that are in the immediate vicinity of residences." (EA p.15) This provision acknowledges but does not disclose any analysis regarding the impacts of dust on residences. Additionally, hauling on Rye Creek dirt road would occur outside the project area and is not apparently covered by this design criteria. Dust from 1200 full and 1200 empty log trucks driving Rye Creek road would harm residents. The DLLII project, as proposed, would cause unmitigated harm to human health due to fugitive dust from haul roads.

Remedy: Mitigate road dust along dirt road haul routes. Prepare an EIS due to the effects to public health.

Issue 2) The Forest Service proposes site-specific Forest Plan amendments related to elk habitat effectiveness, thermal, and hiding cover as well as Management Area 2 standards of Elk Habitat Objectives.

Site-specific amendments are meant to address unique characteristics of a particular forest area, not conditions that are common throughout an entire forest or region. For example, in League of Wilderness Defenders, et. al. v. Connaughton, et al., plaintiffs challenged that the Snow Basin project area did not have distinguishing characteristics, and therefore a site-specific amendment was not justified. No. 3:12-cv-02271-HZ (D. Or. Dec. 9 2014). LEAGUE OF WILDERNESS DEFENDERS/BLUE MOUNTAINS BIODIVERSITY PROJECT, et al.,v. KENT P. CONNAUGHTON, et al.

The Forest Service must explain the unusual or unique aspects of the project area itself that necessitate the proposed site-specific amendment over a forest-wide amendment. It must show how the site-specific amendment is based on unusual or unique aspects of the site itself when compared to the forest generally. The BNF has used EHE site specific amendments on 226,119 acres of BNF's total of 389,820 acres suitable timberland (FP, p. III-2) in the last 12 years.

Certain resources other than elk benefit from implementation of the EHE standards, which acts as surrogate protection. Make a list of the resources that could be affected by the proposed action of site specific amendments, and analyze the impacts.

Remedy: Complete a Forest-wide Forest Plan amendment including cumulative impacts analysis as well as analysis of impacts to affected resources in addition to elk. Or design a project that does not need site-specific Forest Plan amendments.

Commented [LC1]:

Issue 3) The project may adversely affect species listed or critical habitat designated under the Endangered Species Act (ESA) and therefore needs formal consultation for grizzly bears and lynx.

Remedy: Complete formal consultation.

Issue 4) My comments to the EA were not addressed to any significant degree. I think the Content Analysis Team went to sleep over my comments. Remedy: Show me some "consideration" of my comments from Appendix C that would indicate you considered them and that this is not just a charade.

Larry Campbell