

Bitterroot National Forest
West Fork Ranger District
6735 West Fork Road
Darby, MT. 59829
SETH CARBONARI District Ranger

April 20, 2021

Re: Mud Creek Project Comment submitted electronically via project website

Dear Mr. Carbonari,

Thank you for the opportunity to comment on the Mud Creek project. The condition-based approach does not provide adequate information to meaningfully comment. You are asking for maximum flexibility to meet desired conditions, while desired conditions for the Bitterroot National Forest are based on an obsolete 1986 forest plan. The bevy of project and forest plan amendments do not satisfy the National Forest Management Act that requires forest plan revisions at an approximate 15-year interval or as necessary based on changing conditions and best available science, at the landscape scale. The Bitterroot National Forest is long past due for a forest plan revision, under the 2012 planning-rule.

I searched the existing forest plan website in an attempt to find a listing of BNF forest plan and project amendments. The latest entry was titled Amendments #21-27, (but only included up to #26 for Trapper Buckhouse Land Stewardship Project) signed by Dave Campbell in 2007. Fourteen years have passed, and it is common knowledge that projects on the BNF operate under forest plan amendments. However, this collective information is not readily available to the public. The latest 5-year Review that is posted is dated 1994. Yet, with the Mud Creek project you are asking for still other forest plan amendments, without the information necessary in the customary format on the forest service website. As a result the public is denied the context of the bevy of amendments you have already granted yourself.

The EA states (pg 10) states, 'Condition-based management is a system of management practices that relies on specific design features to create desired outcomes on the ground. The proposed action describes a suite of activities available to manage the project area over a period of approximately 20 years.' What vague drivel. Instead of asking the public to give you a blank check over a 20-year period to do god knows what under a 'condition-based approach' with yet more forest plan amendments, I suggest you spend the taxpayers money cleaning up the neglected data and files so that we know what is going on.

The vagueness of the condition-based approach does not adequately describe what you would be doing where. Figure 4: ***General Locations Available for Commercial Harvest Treatment Types in the Mud Creek Project Area*** is three-quarters of the analysis area. Figure 5: ***Locations Proposed for Low- and Mixed-Severity Fire to Address Fuels Management Objectives in the Mud Creek Project Area*** is essentially the entire analysis area. The irony is the proposed action would basically treat the whole area with the purpose of protecting an expanded WUI, except for the one area that actually will best protect private property, the Home Ignition Zone. The EA doesn't even mention the Home Ignition Zone.

In case you haven't noticed, the 'Condition-based Approach' was litigated on the Tongass NF and the court did not uphold it. I urge you do the ground-work first, incorporate the best available science, put out a descriptive proposed action that provides adequate spatial detail; a treatment design that is site-specific, taking into account landscape variability: aspect, topography, microclimate, and existing old species diversity. Only then will the public have the opportunity to provide meaningful comments on the project.

Thank you for the opportunity,

/CLAUDIA NARCISCO