

January 15, 2022

Dear Sirs and Madams:

I have been working as an arborist for the last 30 years, the last 28 years here in the Bitterroot Valley. I am self-taught by extensive reading and perhaps more importantly by observing trees in natural forests and in man-manipulated environments, from clear-cuts to urban centers. My observations have guided my work here in the valley to the benefit of many homeowners, businesses, communities, and municipalities. What I have learned is that nature knows best, and we know little.

I do know that coarse woody debris is key to forest health in many ways.

The benefits to old growth forests provided by coarse woody debris cannot be understated – indeed, it is one of the aspects of the definition of old growth forests. We have extraordinarily little old growth. The little bit of old growth that remains is because those areas were unlogged/untreated. One of the goals of this project stated on your website is to “retain old growth status in all treatment units.” This should be restated, given how little old growth remains to say, “retain all old growth in our forests.” In other words, do not treat old growth! The reason we have old growth is that it has not been treated. “Treatment” equals degradation of the tree stands and simplification of the ecosystem.

A review of 1,500 wildfires in the western US found the highest severity occurred in areas where logging and other fuels management (treatment) prevailed! Wilderness areas and National Parks where logging is prohibited, thus had the greatest biomass burned at lower severity. Increases in fire severity comes with a decrease of protection status. Protected (i.e., untreated) areas burn at lower severity.

*Bradley, C.M., C.T. Hanson and D.A.Della.2016. – Does increased Forest protection correspond to higher fire severity in frequent – fire forest of the western United States? Ecosphere7(10):01492.10.01492.10.1002/ecs2.1492*

The ecological costs of treating old growth are high.

- Higher likelihood of intense fire
- Weed infestation
- Simplification of habitat to the detriment of all (wildlife, hunters, trappers, fishermen, nature lovers, tourists, business owners, etc.)

Please read the study mentioned above in italics. If the project is to improve the health of old growth, we should stay out of all remaining old growth with our notions of treating them.

The idea of thinning old growth forest patches down to as little as 8 trees per acre is preposterous. Sure, there are some areas where this is the natural state, but to remove old trees to achieve this is disingenuous and detrimental to the remaining forest. Substantial reductions in western US winter and spring snowpack are projected as the climate warns. Science2017.global change.gov. Every farmer knows that mulch (CWD) helps retain water. Our forests need water. Please retain all CWD.

Thank you in advance for your time and consideration. Please feel free to contact me with any questions.

Sincerely, Andy Roubik, [REDACTED]