

May 19, 2022

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Stevensville Ranger District

Steve Brown, District Ranger
U.S. Forest Service
Stevensville Ranger Station
88 Main Street
Stevensville, MT 59870

Dear Mr. Brown:

I am commenting on the Bitterroot Front Projects, in extreme western Montana. The project area consists of 143,983 acres along the eastern face of the Bitterroot Range with a western border adjacent to the Selway-Bitterroot Wilderness Area with 97% of National Forest System (NFS) lands located in Ravalli County.

I recognize the intense pressures on our wildlife from habitat loss and climate change, and I advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

It is evident in reading the scoping document that the main focus of this project is on timber harvesting and vegetative treatments. However, there is very little attention to detail on how these activities are going to affect wildlife or their respective habitat or how many miles of temporary or new roads are to be constructed.

Bitterroot Front Project

Table 3. Commercial timber harvest potential outside and within inventoried roadless areas on the Stevensville and Darby-Sula Ranger Districts.

Opportunity Area	Outside of Roadless areas	Within inventoried Roadless Areas	Total acres of treatment opportunity
Lolo-Carlton	77	2	79
Sweeney	3,155	1,203	4,358
Brooks		1,125	1,125
McCalla-Sherrott	3,612	1,308	5,120
Big Creek	1,586	100	1,685
Smith	2,184	10	2,194
Gash	1,613	15	1,628
Bear Creek	797		797
Fred Burr	274	2,060	2,335
Cow Creek	321		321
Tamarack	216	55	271
Blodgett Trailhead	29		29
Canyon Creek South	140	640	779
Roaring Lion-Carnes-Hayes	3,579	719	4,297
Lost Horse	2,000	5,212	7,212
Como North	4,605	78	4,683
Como South	2,344		2,344
Como		320	320
Spoon McCoy	6,632	184	6,816
Trapper Bunkhouse	8,077	214	8,291
Total	41638	13245	54883

The existing forest and fuels conditions within these areas will determine the intensity and specific types of vegetation management that occurs, and, in some cases, commercial timber harvesting may be followed by post-harvest fuels management activities to meet project objectives.

Amount of Commercial Logging is Extreme:

The scoping document discloses on page 9 those lands where commercial timber harvesting is not applicable. Even with that, however, the document also discloses that 55,133 acres will be subject to harvest. That amounts to 38.3% of timbered lands within the Project Area being commercially logged

We know the populated areas have a risk to homes and a likelihood of wildfire. However, logging is not the best first step. Below are available resources that should be utilized.

This report presents data about wildfire risk, socioeconomic vulnerability, and land use to help communities understand their relative wildfire risk profile. It was created through a partnership between Headwaters Economics and the U.S. Forest Service through the Community Planning Assistance for Wildfire program using data from Wildfire Risk to Communities.



<https://cpaw.headwaterseconomics.org>

Community Planning Assistance for Wildfire (CPAW) works with communities to reduce wildfire risks through improved land use planning. CPAW provides communities with technical land use planning recommendations, hazard assessments, custom research, and training.



<https://wildfirerisk.org>

Wildfire Risk to Communities is a free, easy-to-use website with interactive maps, charts, and data to help communities in the United States understand, explore, and reduce wildfire risk. Wildfire Risk to Communities is a project of the USDA Forest Service, under the direction of Congress, in partnership with Rocky Mountain Research Station's Missoula Fire Sciences Laboratory, Pyrologix, and Headwaters Economics.

Project partners



<https://headwaterseconomics.org>

Headwaters Economics is an independent, nonprofit research group. Its mission is to improve community development and land management decisions.

Headwaters Economics provides original and effective research to help people and organizations develop solutions to some of the most urgent and important issues that



<https://www.fs.usda.gov/>

The Forest Service, an agency of the U.S. Department of Agriculture, administers national forests and grasslands encompassing 193 million acres.

The Forest Service's mission is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations.

Here is a link to a program in Colorado; <https://www.cpr.org/2022/05/18/colorado-wildfires-building-codes/>. This program focuses on educating the local population about what can be done assess wildfire risk and community planning to reduce wildfire risks.

Using Federal Dollars Wisely

Ravalli County is almost 75% federal land. It makes more sense to help protect private lands with the federal dollars than log the Wildland Urban Interface.

Private Lands	23.9%
Conservation Easement	1.7%
Federal Lands	73.6%
Forest Service	73.4%

Data Source



A Profile of Wildfire Risk

Selected Geographies:
Ravalli County, MT

This is the website that much of the data has been gathered from.

Wildfire Exposure



Percent of Total

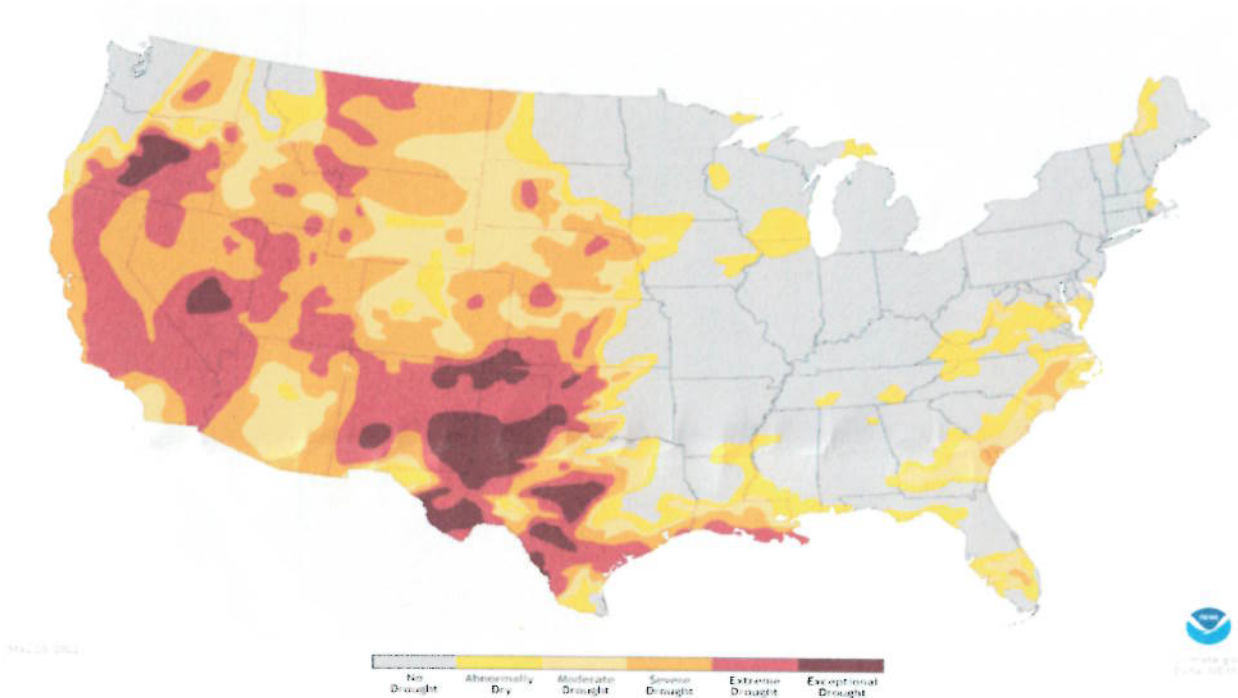
Homes directly exposed	69.0%
Homes indirectly exposed	31.0%
Homes not exposed	0.0%

Here is the current drought map. It shows the Bitterroot Front to be in abnormally dry to moderate drought conditions. [Montana Climate Assessments](#) project this warming trend to continue and is an indicator of changing climates. For a project the size and scope of the Bitterroot Front Project, climate change needs to be an element of evaluation. We know that wildfires will occur, and we need to respond wisely.



2017 montana climate assessment.pdf

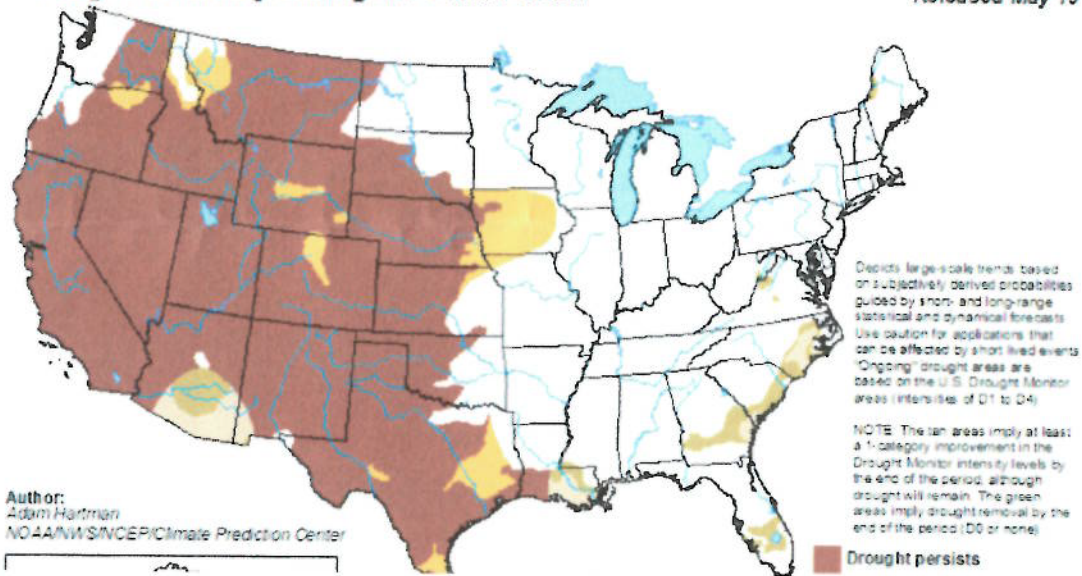
The [Montana Climate Assessment](#) is a good starting point. Current conditions of hot and dry are predicted to continue.



Below is the NOAA seasonal drought prediction, which shows that conditions will not get better either in the near term or as the Montana Climate Assessment shows the far term. Will the relatively small amount of private lands that are affected, it is better to treat, or help to treat the private homes and properties.

U.S. Seasonal Drought Outlook
Drought Tendency During the Valid Period

Valid for May 19 - August 31, 2022
 Released May 19



Data Trends

The trend data shows many strong trends; Employment up, Personal income up, Unemployment down, travel and tourism employment at 15.9% but Timber employment at 1.5%. this tells me that tourism is strong, but not timber.

Wildland Urban Interface

The wildland urban interface is 18.4% developed, which tells me that it is not as large as the project maps indicate.

The over designation of WUI lands is expensive and unnecessary. Attention needs to be focused on those lands centered around manmade structures and infrastructure, not on lands such as inventoried roadless areas (IRA) or those lands far removed from development.

Ravalli County, MT	
Population, 2020	45,002
Trends	
Population % change, 1970-2020	209.4%
Employment % change, 1970-2020	339.7%
Personal Income % change, 1970-2020	630.4%
Prosperity	
Unemployment rate, 2020	5.8%
Average earnings per job, 2020 (2021 \$\$)	\$40,606
Per capita income, 2020 (2021 \$\$)	\$52,203
Economy	
Non-Labor % of personal income, 2020	55.2%
Services % of employment, 2020	66.8%
Government % of employment, 2020	9.7%
Use Sectors ^	
Timber % of private employment, 2019	1.5%
Mining % of private employment, 2019	0.0%
Fossil fuels (oil, gas, & coal), 2019	0.0%
Other mining, 2019	0.0%
Agriculture % of employment, 2020	6.4%
Travel & Tourism % of private emp., 2019	15.9%
Federal Land*	
Federal Land % total land ownership	73.6%
Forest Service %	73.4%
BLM %	0.0%
Park Service %	0.0%
Military %	0.0%
Other %	0.2%
Federal land % Type A**	25.6%
Federal payments % of gov. revenue, FY201	2.2%
Development	
Residential area % change, 2000-2010	19.7%
Wildland-Urban Interface % developed, 2010	18.4%

Please accept my scoping comments

Nancy Schultz

[REDACTED]

Bozeman, MT [REDACTED]

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