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Submitted electronically via
https://cara.fs2c.usda.gov/Public//CommentInput?Project=57302

Objection to Bitterroot National Forest Forest Plan Amendment - Elk, Old Growth, Coarse Woody Debris and Snag Forest Plan Components.

My address and contact info is registered with this electronic submission via https://cara.fs2c.usda.gov/Public//CommentInput?Project=57302. I Michele Dieterich offer this objection to the Bitterroot National Forest Forest Plan Amendment - Elk, Old Growth, Coarse Woody Debris and Snag Forest Plan Components (Amendment). I have submitted scoping comments on the EHE amendment dated 2/10/2020, scoping comments on the additional components of old growth, coarse woody debris (CWD), and snag retention dated 8/12/2022, and the draft Environmental Assessment (DEA) dated 3/3/2023. I incorporate my previous comments into this objection.

As stated in my comments on the FEA, the Amendment offers guidelines instead of standards which weakens the Forest Plan and its ability to fulfill its objectives. Proposed guidelines are not mandatory and are filled with loopholes to allow for logging and roadbuilding on the forest in what were once protected areas or considered unsuitable for timber management. I am especially concerned with loopholes and non-mandatory constraints considering the pressure put on the Forest Service to get the cut out. The April 18, 2023 congressional hearing with Forest Chief Randy Moore demonstrated this in no uncertain terms. While the senators claimed they were concerned about fire mitigation, they expressed greater concern that timber mandates had not been met. Listen from 1:10 to 1:40 where timber targets are discussed. https://www.fs.usda.gov/inside-fs/delivering-mission/excel/chief-moore-testimony-april-18 Under pressure to fulfill timber targets, guidelines will would make it too easy for the agency to treat older forests, in the absence of standards limiting it.

Remedy: Make the guidelines standards, make them clear, make them enforceable, and remove the loopholes. Focus the standards on preserving old growth and mature forests and the reduction of forest roads to improve wildlife habitat.

Insufficient analysis for these sweeping amendments across the forest. In my comments, I expressed concern that this is a Forest plan revision without proper analysis. The Lolo National Forest is currently in revision process. This process originally included both the Lolo and the Bitterroot National Forest (BNF).

Remedy: Join the Lolo National Forest and do a proper forest plan revision with detailed analysis. Or at the very least, analyze these amendments and their direct, indirect, and cumulative effects in an Environmental Impact Statement.

Amendment documentation does not fully disclose or analyze the direct, indirect, and cumulative effects to wildlife including but not limited to lynx, wolverine, grizzly bears, and sensitive species.

This is included in all comments and page 1-2 of my DEA comments. The EHE amendment for road density, thermal cover, and hiding cover have been used by the BNF to protect all wildlife. This has been stated by David Lockman, former north zone biologist in biological assessments (BA) for both Gold Butterfly and Darby Lumber Lands II. Old growth, CWD, and snags are vital to habitat for countless species including indicator species on the forest. No equivalent standard to protect wildlife has been proposed in this amendment.

No remedy has been offered in the Final Environmental Assessment (FEA). The BA for Wolverine was submitted to the United States Fish and Wildlife Service (USFWS) after the FEA was published.

Remedy: Create a forest plan amendment to protect wolverine and a forest plan amendment to protect grizzly bears with road density restrictions and strict habitat protections. Create standards in this amendment that protect wildlife including sensitive species and indicator species on the forest.

Amendment documentation does not fully disclose or analyze the direct, indirect, and cumulative effects to grizzly bear recovery.

I asked in my DEA comments page 5, I question why the BA for grizzly bears did not include old growth, snag and CWD components. No modified BA has been issued.

The USFWS five-year review of grizzly bear recovery page nine states, “In regards to the Bitterroot Ecosystem (BE), the review states, “Approximately 98 percent of the BE recovery zone is designated Wilderness, but the condition of large intact blocks of land is moderate because motorized access standards have not been developed for the recovery zone or for adjacent areas to the north and east, where female occupancy is necessary for natural recolonization of the BE.” And, “Despite its relative isolation from other ecosystems, recent sightings suggest that inter-ecosystem connectivity is possible, although currently very low for the BE”

Remedy: Analyze cumulative effects of all components on the recovery of grizzly bears. Use all available science to analyze grizzly core on the BNF including the BMU’s created by Sieracki and Bader as well as the peer reviewed denning habitat study by the same authors.

I asked in scoping and the FEA that an independent scientific inquiry be conducted to analyze the EHE amendment to establish the best available science on Elk Habitat. Best available science has not been established. Even references in the FEA state that elk need thermal cover and are affected by roads (Hillis). This has not been addressed or resolved.

Remedy: Conduct an independent scientific inquiry into the best available science for elk habitat, consider those findings and disclose them to the public in an EIS.

Amendment documentation does not fully analyze the effects of roads on wolverine, grizzly bears and bull trout.

Allowing roads in areas where they have not been allowed before will affect grizzly bears, wolverine, and bull trout. I discuss this in my FEA comments page 1. Roads are clearcuts and they should be analyzed under Equivalent Clearcut Area (ECA). The analysis does not disclose the cumulative effects of site-specific amendments for EHE in the Mud Creek Project that will allow roads the in areas that would not be allowed with the proposed amendment. The BA for grizzly bears incorrectly assumes that no roads will occur in MA5 roadless areas and elk winter range.

Remedy: Complete a thorough minimum road system analysis across the forest as required in the Travel Planning process. And fully analyze and disclose all effects of roads in roadless areas and areas unsuitable for timber production on grizzly bears, wolverine, and bull trout in an EIS.

The old growth guideline does not fully protect old growth as agreed upon in the original Forest Plan. This is a breech in the contract between the public that highly values old growth and mature forests and the BNF. In response to comments, the BNF removed the word "minimum" from the old growth guideline. Instead of requiring the retention of at least the minimum characteristics, the guideline now calls for the retention of old growth characteristics. If this is anything like the promise to retain large trees when possible that the BNF makes for every project, then functioning old growth will not be retained on the forest, not even close.

Remedy: Create a standard that does not allow for any ground disturbance in old growth and does not allow the removal of any old growth characteristics. The wording should include "will retain old growth characteristics" without a loophole to make the language moot.

The new guideline for old growth includes a line that allows for new best available science to define old growth without public process. This is in violation of NEPA. The guideline and forest plan can change without the need for NEPA process.

Remedy: Take out the line "or new best available scientific information" in the old growth guideline.

The Final EA includes new language in the glossary concerning old growth which allows for a stand to be disqualified as old growth, "A stand is no longer old growth if mortality from disturbance reaches a level where structure, function and process now define the stand initiation phase." This is ambiguous and makes it clear that the analysis is

inadequate. At what point does logging and ground disturbance affect the function and processes of old growth? How many old growth stands will be eliminated from old growth after logging is completed, regeneration begins, and weeds take control? What happens when temporary roads in old growth become a part of the landscape as they usually do across the BNF?

My comments discuss a recent study by DellaSala et al 2022 that cautions against active management in mature and old growth forests. “Active management through logging cannot restore the extensive deficiency of large, old trees from past agency management.” The study encourages a more hands off approach. “Passive management may be able to do this restoration at low cost over very large areas.”

We as humans cannot create old growth. It is only hubris that allows us to think man can improve or create an old growth stand.

The DN admits that the reason to amend the plan is to log in old growth. “The lawsuit brought against the Gold Butterfly project by Friends of the Bitterroot in 2020 has triggered the need to formally amend the plan to keep using this best available science.” However, the DN does not admit that a citizens’ alternative was offered that did not allow road building or road reconstruction and did not allow ground disturbing activities in old growth. The BNF did not analyze this alternative. Instead, they created their own that commercially treated old growth and allowed for road reconstruction. So, in fact, the lawsuit stopped them from commercially logging old growth.

Remedy: The affects of all disturbances to old growth should be analyzed including commercial logging and ground disturbance. The glossary definition should be rewritten with a clear definition of what characteristics and how many there should be to assure old growth function. As Green states, “The minimum criteria are used to determine if a stand is potentially old growth. Where these values are clearly exceeded, a stand will usually be old growth.” At the very least old growth should be defined as a stand where minimum characteristics of old growth are clearly exceeded.

I asked for an analysis of the travel plan recommended road closures and changes**.** The Travel Management Plan Record of Decision stated “The physical treatment of closed routes, through decommissioning or placing in long-term storage, will take future administrative access needs, including fire suppression and timber management, into consideration, and will be analyzed in separate, site-specific NEPA projects and decisions when applicable” (U.S. Forest Service 2016b).” This has not been answered or analyzed.

Remedy: Take a hard look at the travel plan changes to be made during projects and how the programmatic amendment for EHE will affect those proposed and promised changes. Include a standard that guarantees these changes on the ground.

The Amendment does not preserve old growth and mature forests for carbon storage. Midrexler 2022 found that larger trees are important for carbon storage. And Faison et al 2023 states:

> Natural forests (i.e., those protected and largely free from human management) tend to develop greater complexity, carbon storage, and tree diversity over time than forests that are actively managed; and natural forests often become less susceptible to future insect attacks and fire following these disturbances. Natural forest stewardship is therefore a critical and cost-effective strategy in forest climate adaptation.

The DN page 2 alludes to the idea that a forest burned will destroy carbon stores, but Harmon et al found the opposite to be true. Even in high severity fires, "combustion rates are very low overall at the stand (0.1%–3.2%) and landscape level (0.6%–1.8%), because large trees with low combustion rates comprise the majority of biomass."

Remedy: Create a standard that preserves carbon stores by banning ground disturbing activities in old growth and mature forests to mitigate climate and preserve our clean air.

Thank you for considering my objection.

Sincerely,

Michele M Dieterich

All references are attached separately.

References:

Bader, M and Sieracki, P. 2022b. Proposed Grizzly Bear Management Units on the Lolo, Bitterroot, and Portions of the Beaverhead-Deerlodge National Forests, Montana, USA. (Exhibit 2)

DellaSala, D.A., Bryant C. Baker, B.C., Hanson, C.T., Ruediger, L, Baker, W. 2022: Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus?, Biological Conservation, Vol 268, 2022, 109499, ISSN 0006-3207, https://doi.org/10.1016/j.biocon.2022.109499.

Edward K. Faison E.K., Masino, S. A, Moomaw, W. R., 2023 . The importance of natural forest stewardship in adaptation planning in the United States Conservation Science and Practice published by Wiley Periodicals LLC on behalf of Society for Conservation Biology. wileyonlinelibrary.com/journal/csp2 1 of 10 https://doi.org/10.1111/csp2.12935

Mildrexler DJ, Berner LT, Law BE, Birdsey RA and Moomaw WR (2020) Large Trees Dominate Carbon Storage in Forests East of the Cascade Crest in the United States Pacific Northwest. Front. For. Glob. Change 3:594274. doi: 10.3389/ffgc.2020.594274

Sieracki P. and Bader M, 2022a. Grizzly bear denning habitat and demographic connectivity in northern Idaho and Western Montana. Northwestern Naturalist 103(3).